

EXHIBIT B

From: Michael Hayden
Case 1:24-cv-02228-CMA Document 124-2 Entered on FLSD Docket 08/28/2025 Page 2 of 2

Sent on: Wednesday, August 6, 2025 1:41:55 PM

To: [Dan Humphrey](#)

Subject: Re: Conferral Regarding Deposition of C. McDowell

[EXTERNAL EMAIL from michael@unitethepeople.org]

Mr. McDowell does not oppose doing a court-supervised deposition and as I said, I would not object to it. But I must object to the attorney's fees. Mr. McDowell did spend his entire day deposed, 8-9 hours. (Plus QE got to bill for it).

When did you want to meet/confer on this? I do not have any time today. And when is the hearing?

Michael

On Tue, Aug 5, 2025 at 3:48 PM Dan Humphrey <danielhumphrey@quinnemanuel.com> wrote:

Hi Michael,

As you know, your client's conduct at his recent deposition was beyond reproach. We plan to bring this to the Court's attention at a hearing on July 7, 2025, and seek attorney's fees and a court-monitored continuation of his deposition. Please let us know if you object and if so when you are available to meet and confer tomorrow.

Sincerely,

Dan